

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

LAREDO DIVISION

United States District Court
Southern District of Texas
FILED

JUL 22 2004

Michael N. Milby, Clerk

UNITED STATES OF AMERICA,

v.

JULIAN PAUL RAMIREZ Et al.

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Criminal No. L-03-1941

Motion to Admit Exhibits in Advance of Trial

The Government, through undersigned counsel, moves the Court pursuant to Criminal Local Rule 55.2 to admit exhibits in advance of trial and set a deadline for the objection of their authenticity and admissibility and in support would show the following:

1. Trial is scheduled to begin on August 4, 2004 and is expected to last close to two weeks. The Government's file has been available for review pursuant to our open courtesy file policy since January of 2004. In the interests of judicial economy, the Government seeks to admit in advance of trial all relevant and material exhibits to be introduced during the Government's case in chief which are currently in the Government's possession.¹

2. Criminal Local Rule 55.2--Exhibits at Criminal Trials, provides for the pretrial admission of exhibits and states the following:

- A. Authentication of Exhibits-A party requiring authentication of an exhibit must notify the offering party in writing within five days after the exhibit is listed and made available. Failure to object in advance of trial in writing concedes authenticity.

¹The Government reserves the right to introduce any other exhibits which may become relevant at trial or which may come into the custody of the Government after the filing of this motion.


B. Objection to Exhibits-Objections to admissibility of exhibits must be made at least three business days before trial by notifying the Court in writing of the disputes, with copies of the disputed exhibit and authority.

3. The Government has made copies of all trial exhibits with corresponding identification numbers and has hand delivered them to defense counsel on July 22, 2004. This motion shall serve as formal notice that the Government is seeking to admit all exhibits under the provisions of CRL55.2 (A) and (B). Failure to object in writing in advance of trial concedes authenticity and admissibility of all tendered exhibits

4. The Government hereby requests that the Court set a deadline for said objections by defense counsel to the authenticity and admissibility of all exhibits.

Respectfully submitted,

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